
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY


UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. :
HONORABLE MICHAEL A. HAMMER :
KEVIN WILLIAMS, :
a/k/a "KK" : Mag. No. 19-4476

I, Keith Willis, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT B



Keith Willis, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
November 8, 2019, Essex County, New Jersey

Honorable Michael A. Hammer
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession with Intent to Distribute Narcotics)

On or about June 9, 2019, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

**KEVIN WILLIAMS,
a/k/a "KK,"**

knowingly and intentionally did possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

ATTACHMENT B

I, Keith Willis, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about June 9, 2019, at approximately 6:46 p.m., law enforcement officers were in the area of Grant Avenue and Martin Luther King Drive in Jersey City, New Jersey, when they heard multiple gunshots. Four shell casings were subsequently recovered.

2. Subsequently obtained video footage from the area revealed that an individual ("Individual 1") fired multiple shots in the direction of Kevin Williams, a/k/a "KK," ("WILLIAMS"), and others in the area.

3. Video footage then depicted WILLIAMS retrieve a dark colored handgun from a bag that he was holding. WILLIAMS then pointed that handgun in the direction of Individual 1.

4. After Individual 1 retreated from the area, WILLIAMS handed the dark colored handgun to another individual ("Individual 2") who was seated in a 2003 Nissan Maxima (the "Maxima"). As a marked police unit approached the area, WILLIAMS walked away from the Maxima.

5. A review of law enforcement records pertaining to the Maxima revealed that WILLIAMS had been stopped in the Maxima two days earlier on or about June 7, 2019.

6. Later in the evening on or about June 9, 2019, at approximately 11:51 p.m., law enforcement located the Maxima parked in the area of Dales Avenue in Jersey City, New Jersey. The Maxima was towed pending the application of a search warrant.

7. Subsequently obtained video footage depicting the area of Dales Avenue where the Maxima was parked revealed that—between the time of the shooting at approximately 6:46 p.m. and the time the Maxima was towed at approximately 11:51 p.m.—WILLIAMS parked the Maxima in the area of Dales Avenue and accessed the trunk of the Maxima on multiple occasions, seemingly conducting hand-to-hand narcotics transactions.

8. Law enforcement obtained and executed a search warrant for the Maxima, which revealed the following, among other items, in the trunk:

- a. Approximately 140 glassine envelopes of heroin, stamped "Bone Crusher" in blue packaging;
- b. Approximately thirty glassine envelopes of heroin, stamped "La Familia" in blue packaging;
- c. Seven unmarked glassine envelopes of heroin;
- d. One bag of heroin, stamped "Bone Crusher" in blue packaging;
- e. Three plastic bags, containing cocaine; and
- f. Multiple packages of vials commonly used for packaging cocaine.

9. Review of WILLIAMS's criminal history reveals prior convictions for, among other offenses: (1) on or about July 14, 2017, distribution of controlled dangerous substances on school property, in violation of N.J.S.A. 2C:35-7; and (2) on or about August 24, 2018, aggravated assault, in violation of N.J.S.A. 2C:12-1(b)(2). Accordingly, WILLIAMS is subject to treatment as a career offender under the United States Sentencing Guidelines.